

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ESSEX INSURANCE COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	NO.: 1:16-cv-02580
	)	
HOUSECALL PHYSICIANS OF	)	
ILLINOIS, S.C. D/B/A MD@HOME;	)	
CHARLES DEHAAN; THELMA YOUNG;	)	
RAQUEL BROWN; JUDITH KOHL;	)	
DEBORAH CURTIS; GERTRUDE	)	
GLASPIE; DEBRA LINGELBACH;	)	
BRENDA NELSON; and SUSAN	)	
BEESELY,	)	
	)	
Defendants.	)	

**ESSEX INSURANCE COMPANY'S  
MOTION FOR LEAVE TO SEAL CERTAIN EXHIBITS PURSUANT TO LR 26.2**

Now comes Essex Insurance Company ("Essex") and for its Motion to File Under Seal pursuant to LR 26.2, states as follows:

1. Essex is filing this Motion for Leave to Seal Pursuant to LR 26.2 contemporaneously with its Motion for Summary Judgment, its Memorandum of Law in Support of its Motion for Summary Judgment, and a Local Rule 56.1 Statement of Undisputed Facts.

2. Certain of the documents that support Essex's Motion are (1) Rockford Police Department Reports against Charles Dehaan which identified numerous other victims; (2) March 23, 2014 Des Plaines Police Department Arrest Report for Charles Dehaan; (3) January 2014 State of Illinois Department of Financial and Professional Regulation records including Notice of Temporary Suspension, Order, Petition for Temporary Suspension, Complaint, and Affidavits; and, (4) Criminal complaint against Charles Dehaan, all of which attorney Michael Gravlin, on behalf of plaintiff in Lingelbach Lawsuit, served on Housecall Physicians on February 6, 2015, in response to Illinois Supreme Court Rule 214 production requests. (Exhibit B.)

3. The Rockford Police Department records include complaints of sexual abuse against Dehaan by more than 20 alleged sexual abuse victims including the addresses, telephone numbers, dates of birth, and personally identifying information of the alleged victims as well as certain witnesses. In addition, because the police reports involve reports of Dehaan's former patients, they may include sensitive medical information regarding the alleged victims as well as some medical records. (Exhibit B1.)

4. The Lingelbach Lawsuit February 6, 2015 document production also contained the March 23, 2014 Des Plaines Police Department arrest report of Dehaan for the charges against him by Joan Shortridge. (Exhibit B2.) This arrest report contains personal information such as date of birth, addresses, and phone numbers not only of Joan Shortridge but also of alleged witnesses, including Ms. Shortridge's brother and boyfriend. (Exhibit B2.)

5. On April 6, 2015, Michael Gravlin, on behalf of plaintiff in the Beesely Lawsuit, served responses to Illinois Supreme Court Rule 214 discovery requests on Housecall Physicians (Exhibit C) which included all of the very same documents: (1) Rockford Police Department Reports involving Charles Dehaan which identified numerous other complainants (Exhibit C1); (2) March 23, 2014 Des Plaines Police Department Arrest Report for Charles Dehaan (Exhibit C5); (3) January 2014 State of Illinois Department of Financial and Professional Regulation records including Notice of Temporary Suspension, Order, Petition for Temporary Suspension, Complaint, and Affidavits; and (4) Criminal complaint against Charles Dehaan.

6. In that regard, Housecall Physicians served these same documents that plaintiffs served on Housecall Physicians in two of the underlying matters to Essex in this case, bates marked "HC 168-273." The documents bates marked as HC 168-273 are the discovery responses that Michael Gravlin, on behalf of plaintiff in the Shortridge Lawsuit, served on Housecall Physicians in response to Illinois Supreme Court Rule 214 on May 19, 2015, after the Essex Policy inception.

(Exhibit F, Housecall Physicians' Responses to Essex's First Set of Requests for Production, HC 168-273.)

WHEREFORE, Essex respectfully requests leave to file Exhibits B1, B2, C1, C5 and F under seal.

DATED this 13th day of February, 2017.

Respectfully submitted,

COZEN O'CONNOR

/s/ Anne L. Blume

One of the Attorneys for Plaintiff,  
ESSEX INSURANCE COMPANY

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on February 13, 2017, he caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court and served upon all counsel of record using the Court's CM/ECF system.

/s/ David L. Sanders